

**IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF TENNESSEE, NASHVILLE DIVISION**

JOHN DOE #12,

Plaintiff,

vs.

WILLIAM B. LEE, *et al.*,

Defendants.

Case No. 3:22-cv-00712

Judge Trauger

PLAINTIFF’S MOTION FOR LEAVE TO FILE DECLARATION UNDER SEAL

Pursuant to Local Rule 5.03, Plaintiff moves the Court for leave to file his declaration in support of his motion for a preliminary injunction under seal. In support of this motion, Plaintiff states:

1. Plaintiff has moved the Court for an order permitting him to proceed under a pseudonym and requiring that “[a]ll documents filed with the court that contain plaintiff’s name or information that identifies Plaintiff or Plaintiff’s family members, directly or indirectly...shall be redacted or filed under seal.”

2. Plaintiff needs to file a declaration in support of his motion for a preliminary injunction. That declaration discloses his true name and other detailed information (*e.g.*, the exact date of offense and conviction, the location of the offense and conviction, identifying information about the victim of the offense, the location of past and current residences, age, employers, education) that in combination could realistically be used to identify Plaintiff.

3. Plaintiff has attached a redacted version of his declaration to his motion for a preliminary injunction.

4. Sealing this information is a narrowly tailored means to avoid identifying Plaintiff, protect his legitimate interest in avoiding unwarranted opprobrium, humiliation, and harassment

from bringing these actions, and preserve his chance to no longer be publicly identified as a registered sex offender if he prevails in this action.

Plaintiff therefore requests the Court to grant the relief requested above and any other necessary or proper relief.

Dated: September 14, 2022.

Respectfully submitted:

/s/ W. Justin Adams

Edward M. Yarbrough (TN BPR # 004097)

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Plaintiff's Counsel

CERTIFICATE OF SERVICE

I certify that on September 14, 2022, a copy of the foregoing was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by email:

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/s/W. Justin Adams

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